

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

JANET JENKINS,

Plaintiff,

v.

KENNETH L. MILLER, *et al.*,

Defendants.

No. 2:12-cv-184-WKS

**PLAINTIFF’S RESPONSE IN OPPOSITION TO DEFENDANTS  
LIBERTY COUNSEL, INC. AND RENA M. LINDEVALDSEN’S  
INSTANTER MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT**

Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen (together, the “LC Defendants”) seek to file reply briefs that exceed the Court’s page limit by an eye-popping 125 pages. *See* ECF 882. Combined, the LC Defendants’ replies total 145 pages—more than double the length of Plaintiff’s 64-page omnibus opposition to which they are replying. *Compare* ECF 880, 881, *with* ECF 868. Plaintiff would not have opposed a more modest request to file 40 total pages of reply briefing, but the LC Defendants’ request is unjustified, plainly excessive, and unduly burdensome to both the Court and the parties. The Court should deny their motion.

The LC Defendants advance no good cause to so extraordinarily exceed the Court’s 10-page limit for reply memoranda. Although the LC Defendants note that Plaintiff received leave to exceed the page limit for her opposition brief, *see* ECF 882 at ¶ 3, they fail to mention that this extension was only necessary because of the LC Defendants’ enormous and largely duplicative opening briefs totaling 163 pages. *See* ECF 832, 854. And the Local Rules provide for reply briefs less than half the length of opposition briefs—there is no reason why the LC Defendants should be permitted to file replies that more than double the opposition. *See* L.R. 7(a)(4)-(5).

Plaintiff therefore respectfully requests that the Court deny the LC Defendants' motion and require them to refile briefs of at most 40 combined pages.

Respectfully submitted.

September 16, 2024

/s/ Lina Bensman

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